

# **SIZEWELL C STAGE 3 PRE-APPLICATION CONSULTATION**

## **Representations from Leiston-cum-Sizewell Town Council**

### **SUMMARY**

The impact on local residents, the specific impact on the town centre and the wider impacts from the additional traffic remain the primary concerns of Leiston-cum-Sizewell Town Council and their residents. Almost 90% of the construction will take place in this parish.

The current Stage 3 consultation has better detail than Stage 2 in many areas and has allowed Councillors and residents to get a better feel for the sheer size of the project and form better impressions on just what the impacts might be. This has heightened concerns in some areas, particularly around the size of the platform, and these are detailed below.

Whilst welcoming many of the socio-economic benefits that a major infrastructure will bring the main issues detailed below concentrate on the undoubted disruption and inconvenience the town and surrounding area will experience throughout the lengthy construction phase and also raises topics where mitigation and compensatory measures could be included in EDF Energy's future plans.

Councillors would like to thank EDF Energy for the better timing of this consultation, the wide distribution of documentation and the willingness to meet and discuss issues with groups and parishes when requested.

### **1.0 INTRODUCTION**

- 1.1 These representations are made on behalf of Leiston-cum-Sizewell Town Council.
- 1.2 They represent the views of the elected members of Leiston-cum-Sizewell Town Council. This response was formally endorsed by the Town Council at its meeting on 19 March 2019. Their views took into account various representations and submissions made to them by residents over the course of the consultation.
- 1.3 This response is structured as follows:
  - Section 2 - Addresses the overall principle of Sizewell C.
  - Section 3 - Provides some local context to the area and sets out the principal concerns of Leiston-cum-Sizewell Town Council.
  - Section 4 - Highlights the key negative impacts to beach access, natural and heritage assets.
  - Section 5 - Identifies key socio-economic impacts of Sizewell C to the Leiston-cum-Sizewell.
  - Section 6 - Presents mitigation measures to help alleviate negative impacts and secure positive impacts not covered in in Section 4 and 5
  - Section 7 - Identifies transport impacts and required mitigation measures.
  - Section 8 - Provides a response to the different options presented in the Stage 3 consultation material.
  - Section 9 – Identifies the considerable challenges of the first stages of construction
  - Section 10 - Lists additional evidence required to support the Sizewell C proposals and work that needs to be done with other stakeholders.
  - Section 11 and 12 – Consultation and Conclusion

Appendix A – for purpose of clarity this provides a list of and rationale for all requested improvements to community infrastructure and amenity.

Appendix B –covers the mitigation and compensation required specifically for Leiston Town Centre.

## **2.0 NATIONAL ENERGY STATEMENT**

- 2.1 It is the understanding of Leiston-cum-Sizewell Town Council that, under the Government's National Policy Statement for Nuclear Power Generation (EN-6) and the recent consultation for revision of this policy (for post 2025), Sizewell remains a nominated site for a reactor. The finalised strategic site criteria in the new consultation remains the same however when relating to the size of the site nominated. It also still gives the nominator an element of flexibility on the size once detailed plans are drawn up. The extant EN6 gives leeway on flooding issues and Habitat Regulations via a mechanism called Imperative Reasons of Overriding Public Interest (IROPI). This was to meet the Government's objective to maintain or enhance levels of energy security that they felt held a certain urgency back in 2011. A lot has changed since then and the upsurge of wind power in particular has lessened the urgency and, in our opinion, the need for potential adverse effects on the integrity of the European Sites which cannot be effectively avoided or mitigated to achieve the Governments aim in this document. Importantly, Sizewell is the only site nominated in an Area of Outstanding Natural Beauty.
- 2.2 It is the flexibility of site size that has caused the most concern though as, the plans for two reactors on the site (for economy of scale) has pushed the EN6 site boundaries out too far and has raised serious concerns about how the site will now impinge on the local environment and, more importantly, resident's amenity in the future.
- 2.3 It is acknowledged that Government is the key driver in how many of the 8 sites from EN6 are actually needed. They will be influenced of course by the timescales for delivery, and this will feature heavily in the selection process.
- 2.4 Even bearing in mind the strategic nature of these decisions it is understood that Sizewell C will be considered on its own merits by an independent Planning Inspectorate who will pass on their recommendation to the Secretary of State to make the final decision on the site's suitability. Not it's necessity.
- 2.5 This does not mean therefore that Sizewell C will automatically be granted a Development Consent order.
- 2.6 There is also still the fundamental concern of locating so much of the country's power supply in one area. This is exacerbated by National Grid currently allocating enormous capacity on the same line to various other major infrastructure projects from the wind sector. Loss of transmission on this one line could lead to major grid instability.
- 2.7 With this in mind, Leiston-cum-Sizewell Town Council still have serious ecological and practical concerns for siting two more reactors in an AONB (and SSSI) and would insist that the issues set out in these representations are fully addressed and mitigated for should the Secretary of State subsequently consider this site to be suitable. It is assumed that the ONR will be providing a clear statement on whether

they are content that the site is large enough to support two reactors and the ancillary equipment along with waste storage. We commented in Stage 2 that the illustrative maps did not appear to leave much leeway for any additional buildings that may have become necessary and this has been proved pertinent as the size of the site has now increased. Sizewell B is having to relocate facilities and there are unsightly and unwanted pylons now being proposed on the site too due to the restricted footprint. Members are seriously concerned that the new land take, predicted in our Stage 2 response, will have a huge detrimental effect on the surrounding designated areas, especially the coastal path. In our opinion this site is too small for the proposed project. Members would therefore like assurance from ONR and EDF Energy that this has been considered and from the Planning Inspectorate, in due course, that this extra incursion and impact on the surrounding designated sites is acceptable.

- 2.8 There is also concern about a possible displaced flood risk from the strengthening and easterly movement of the sea defenses plus the unknown impact of the Beach Landing Facility and its access road on coastal processes.

### **3.0 LOCATION OF LEISTON AND SIZEWELL**

- 3.1 Leiston is a small market town that is adjoined by the hamlet of Sizewell, with a collective population of around 6,000. It is located on the coast between Lowestoft and Felixstowe. Leiston is served by a variety of shops, public houses, cafes, and restaurants. It also has its own recognised football club in the Football League, a leisure centre, a Film Theatre and is home to the world renowned Long Shop Museum. It also adjoins the internationally famous RSBP Minsmere bird reserve and is home to Leiston Abbey.
- 3.2 The proximity to the coast and its position in the centre of the AONB means that residents and visitors to Leiston and Sizewell enjoy excellent access to the amenities offered by having the coastline on their doorstep and country walks all around the parish. This includes good access to the beach for recreation including walking, dog walking, and swimming. The Park Run along the frontage of the Power Stations to Minsmere is also very popular and a big benefit to resident's health and wellbeing.
- 3.3 Leiston has an established Neighbourhood Plan, with vision, and this document should be used by EDF Energy to assess the efficacy of supporting the town and entering into partnership with the town to work on the bigger projects with them as its major employer and neighbour for many years to come.
- 3.4 The impacts on current amenities, the loss of valuable recreation space at Sizewell and the impacts from the additional traffic associated with the proposed development of Sizewell C, are a major concern for the residents of Leiston and Sizewell.
- 3.5 These impacts are of particular concern for Leiston and Sizewell during the construction period – especially the first two years.
- 3.6 It should be noted that there are other very large construction projects planned to take place in the same very small area which will not only interlap but possibly interfere with the initial stages of SZC construction. These will have a cumulative effect on the parish and surrounding area and must be factored in. They will include Scottish Power Renewable wind farm projects, Interconnectors from Europe, the

continued dismantling of Sizewell A and the possible relocation of facilities on Sizewell B.

#### **4.0 PUBLIC RIGHTS OF WAY, LOSS OF ACCESS TO BEACH AND IMPACT ON NATURAL AND HERITAGE SITES**

- 4.1 Leiston-cum-Sizewell Town Council is particularly concerned about the potential loss of public rights of way and any restriction of access, including access to the beach from the Kenton Hills and Goose Hills Walks and along the beach itself (part of the England Coast Path – a new National Trail). The closure of Bridleway 19 is a significant loss of amenity which is only partly mitigated by the alternative route. This must be re-opened as soon as construction allows.
- 4.2 Access to the public beach is a fundamental right of residents and visitors alike, this is going to be severely restricted with the proposal for Sizewell C.
- 4.3 Although EDF Energy are suggesting that public access will still be permitted along the length of beach in front of the proposed Sizewell C site during most of the construction period, it will be a loss of the current amenity and views enjoyed at present which must be carefully considered and mitigated for. With the new easterly land take for the defences it is likely that this will mean walking along the foreshore for many years to come and then only when it is not closed off completely.
- 4.4 During the construction of Sizewell B a high chain-link fence with barbed wire on the top was used along the length of the restricted beach area. For Sizewell B this demarcated public footpath measured approximately 4m wide.
- 4.5 The fencing arrangement used during the construction of Sizewell B was poorly planned, and ultimately considered unsuccessful by local residents. The plans for Sizewell C at Stage 2 looked as though the issue had been addressed where, after the initial phase (when the access was planned to be along the foreshore), there appeared to be unimpeded views to the east for walkers using a reasonably sized recreational corridor.
- 4.6 At Stage 2 Leiston Town Council asked that “*Leiston-cum-Sizewell Town Council would wish to discuss any proposed designs for beach restrictions with EDF Energy before they are presented at the next stage*”. No discussions have taken place and, with the easterly extension of the site boundary, it is unclear whether there will now be any recreational corridor at all. Figure 7.22 in the Consultation document infers the recreational corridor is wider at Stage 3 (than in Fig 7.20 in Stage 2 papers) and is clearly wrong and misleading. With the new defences the recreational corridor will probably have to ultimately be on the crest of them after construction is complete, rather than seaward, as the small protective dune above the shingle beach will no longer be there to shelter the smaller recreational corridor and this, now being narrowed, will be further eroded by coastal surges and the elements. This will be a major loss of amenity for our residents and visitors.
- 4.7 During the initial phase most definitely, but probably throughout the whole construction, **a sturdy maintained walkway must be laid on the shingle** for less able or steady residents as to walk along shingle is not easy.
- 4.8 It is noted that the existing track along the beach front is being used by the Civil Nuclear Constabulary. There is concern that EDF Energy will seek to use this existing track to access the rear of the site proposed for Sizewell C. Leiston-cum-

Sizewell Town Council are keen to ensure that this existing track is not used by any vehicles to access the beach, other than security vehicles. This must be formally agreed in writing by EDF Energy as part of any future development of the site and **LTC propose and request that this is covered in a statement of common ground between LTC and EDF Energy**

- 4.9 Leiston-cum-Sizewell Town Council also remains concerned about the impacts on the surrounding environment, including the Ramsar site of European importance, and the SSSI site of regional importance. The impact on other local heritage assets, such as Leiston Abbey, also still need to continue to be fully considered. **The Town Council would fully support any representations made by our neighbours in the RSPB and those made by Natural England and the Environment Agency in this regard.** Their expertise and understanding of the impacts must be addressed by EDF Energy. EDF Energy has a huge responsibility to protect our landscape if they are to be granted permission on this site.

## 5.0 SOCIO-ECONOMIC IMPACTS

- 5.1 Leiston-cum-Sizewell Town Council has identified the following socio-economic impacts as a result of the Sizewell C proposals:

- Increased pressure on emergency services and increased traffic on access routes and in the town.
- Potential negative impacts to some local employers but positive impacts overall in terms of local employment opportunities.
- Potential positive impacts to local education, skills and vocational training opportunities.
- Potential negative impact to the local economy following the peak of construction.
- Increased visitor numbers to the town centre during the day and evening.
- Distortions to the local housing market.
- Negative impact on tourism.

- 5.2 Where negative impacts are identified these should be mitigated for but equally important is that the positive impacts to the local economy are both secured and maximised.

### Emergency Services

- 5.3 Further development at Sizewell will require appropriate consideration with the emergency services. Additional risks associated with the construction and operation should be identified ahead of the project to enable adequate planning, resourcing, training, site familiarisation and equipment provisions for the emergency services. Any extra resources must be specifically bought in and must remain earmarked for the development. There should be absolutely no dilution whatsoever of current resources before, during, and after construction. With the big increase in risk from extra traffic, heavy industry, hazardous materials and increased personnel in the parish a strategy must be looked at to protect the on-call firefighters in Leiston in particular. An increase in call outs will test the good will of the firefighters' employers so this needs to be addressed separately. Fears have also been raised, highlighted during the construction of SZB, that retained firefighters may be lost due to them changing employment and joining the construction site. EDF Energy is asked to be aware of this problem and to work with local employers on recruiting and retention

of firefighters during the project. EDF Energy are also requested to look at how they would support the improvement of poor response times of our Ambulance Service to postcode area IP16 for their own peace of mind as well as to re-assure residents they wouldn't get even worse service due to increased traffic. **It is requested that serious consideration be given to formally requesting that the joint Leiston Fire/Police Station also house a small ambulance station.** Leiston Town Council are aware that discussions are taking place between EDF Energy and Suffolk Constabulary and are in full support of any measures Suffolk propose to augment the Constabulary's provision to be able to effectively police the project, Leiston and the knock on effects in the wider area.

### **Local Job Market**

- 5.4 Previous experience with Sizewell power stations has proved that the new jobs associated with the Sizewell C proposal will have an impact on the local job market. It is expected that EDF Energy will seek to employ a significant proportion of local people. Fair and equal opportunities need to be applied to recruitment for the Leiston-cum-Sizewell communities. Although it is noted that Sizewell C will have a potential effect on some local employers, Leiston-cum-Sizewell Town Council expects the local area to benefit from the employment opportunities that will be provided. It is expected and hoped that a Major Projects Agreement will be made with a Union to regularise the workforce.

### **Education, Skills and Vocational Training Opportunities**

- 5.5 Leiston-cum-Sizewell Town Council also wants to see EDF Energy continue to make positive contributions towards education in the area through their liaison with our local academies. EDF Energy would be turning Sizewell into a highly specialised and technical area for several decades to come, therefore it would be only appropriate that they should look to pass some of these skills and knowledge into the local area. Leiston Town Council welcomes their current work with Alde Valley Academy and ask that they also support ancillary skills and vocational training which are just as important to support the estate. EDF Energy are requested to look at establishing a training and skills centre in Leiston, either on their own, or with other energy companies including the NDA. This would **complement the project and remain as an important legacy in this area once the station is established. This could be achieved in Partnership with the Leiston Together Board and Suffolk New College on the Coast.**

### **Managing the Impact Post Peak Construction**

- 5.6 It is hoped and expected that a strategy is discussed and implemented in good time to manage the slump in employment after various phases of the construction programme. Leiston suffered from this during the previous builds and ways must be found to manage it this time.

### **Increased Number of Visitors to the Town Centre During the Day and Evenings**

- 5.7 It must be remembered that the non-home-based-workers will also have the freedom to travel when they are not at work. They will likely use their own vehicles or walk into surrounding areas for personal or leisure use. Previous developments at Sizewell have resulted in serious 'anti-social' behaviour in the town, which must not be allowed to happen again. The implementation of the proposed contractual drug and alcohol policy should alleviate most of the worst problems and would allow

workers to enjoy the town and also help businesses in the process. This must be rigorous and consistent. **A continuous shuttle bus service into Leiston and to the off site sports facility** would benefit the workers and help manage the car parking situation. It is hoped that changing attitudes and better management will make the construction less challenging for the night time economy than was the case previously. **An active “Construction Consultative Committee”** between EDF Energy, the Town Council and relevant bodies should be set up early on to inform and communicate any issues that come to light.

### **Distortions to the Local Housing Market**

- 5.8 Accommodation in the town is a big concern too. The demand for accommodation, some temporary and some more permanent, especially from better off workers, would distort the housing market in Leiston which, currently, is the only affordable area in East Suffolk. This would have a disproportionate effect on our young residents trying to get onto the housing ladder **or rent at an affordable cost** related to the low wages in the area. Members asked that EDF Energy investigate a scheme to provide financial support to young local families affected by this to avoid them being priced out of the local housing market. Mention is made of a housing fund at Stage 3 and this is welcomed but detail is needed on how a system to monitor and measure the impacts will be assessed and how the fund can be used constructively and appropriately for Leiston residents.

### **6.0 COMMUNITY BENEFITS**

- 6.1 This section concentrates on the mitigation measures required to alleviate the negative impacts, and to secure the positive impacts, identified under section 4 and 5 of this response. These are set out more fully at Annex A and B.
- 6.2 The proposed cycleways and improved footpaths from Sizewell round to Eastbridge are welcomed. It is still strongly requested that **a permissive path be installed under a 3-span access bridge (Option 3 in Stage 2) (or adjusted causeway) to allow residents to walk between the Kenton Hills walks and the beach as soon as possible during the construction phase.** The current causeway option has been selected over the much preferred bridge option with very little understandable justification. It precludes any access to the beach except via the long way round to the sluice for too many years, if ever, and is not supported. The provision of a path under the “causeway” would be a positive boon for residents and allow access to the Minsmere beach walks from Kenton Hills avoiding the need to negotiate the beach works and associated disruption. As the SSSI is being protected from the laydown area a permissive path just outside the southern protected boundary of the laydown site would be very feasible, easily established and much appreciated. It would also allow a circular walk using the new bridleway for those who would enjoy that. This one addition would have a big community benefit. Regarding the new cycleways, another crossing south of the Kenton Hills entrance on Lovers lane, in a safe place, with a footway/cycleway on the east side of the road up to the Kenton Hills entrance would also be very beneficial. Currently, if the cycleway around Aldehurst Farm is used it looks very difficult to cross the road on the Laboratory corner to gain access to Kenton Hills.
- 6.3 The new route and cycleway (with crossings) must be in place before Bridleway 19 is closed.

6.4 To help alleviate the impact of increased usage of the town's daytime and evening facilities, to help manage any unforeseen issues arising from the construction and to increase the amenity available for your workforce, the following mitigation measures are sought:

- Funding of Improved infrastructure in the town centre to alleviate the impact of increased traffic and parking.
- Involvement and help in up-grading and relocating of the library to allow space for increased online stations. The Library is part of the Town Centre Regeneration plan.
- A representative from the Town Council on the Suffolk Community Foundation Board overseeing the community fund.
- A major role for the Town Council in a responsive and powerful "Construction Consultative Committee" to ensure issues are dealt with quickly.

6.5 The most significant project which EDF Energy would benefit from involvement with though would be the regeneration and construction of a new town centre as proposed in the Town's Neighbourhood Plan. EDF Energy would be very welcome to work with the Leiston Community Land Trust and the Leiston Together Partnership (East Suffolk District Council, LTC, CLT and SCC) to help achieve a viable, sustainable and attractive development which would benefit all Sizewell workers now and in the future once Sizewell C construction is complete. Later in the response there is a recommendation that the Visitors Centre be moved into the town too, if a suitable location can be found, as this would add to the tourism provision in the town. EDF Energy is Leiston's major employer and neighbour and it would be beneficial for everyone if they became a partner in the Town's future. Again, this is covered more fully in Appendix A.

6.6 Further information on the community benefits and improvements being put forward by Leiston-cum-Sizewell Town Council are set out in Appendix A and B. These set out the Town Council's assessment of immediate and long-term requirements, and should be used as the basis for any further discussions with EDF Energy on this particular issue. ***EDF is encouraged to enter into meaningful discussions with the Town Council at the earliest appropriate phase of this project and before the public examination sessions with PINS.***

## 7.0 TRANSPORT

7.1 Leiston-cum-Sizewell Town Council originally supported EDF Energy's proposed transport hierarchy: sea – rail – road. They note the environmental factors, the cost and the confidence in delivery of the sea option for it to now be dropped and this has been welcomed by many in the parish. It is felt however that there could be much more use made of the Beach Landing Facility and further exploration of the sea option should be taken forward. They find the veiled references to the viability of achieving a rail strategy in time concerning too but would support this over road. If road remains the only strategy at the DCO stage then the very maximum mitigation schemes must be offered including a 4 village by pass on top of all the schemes detailed in Stage 3.

7.2 Leiston-cum-Sizewell Town Council support the maximum by rail option and are happy with the choice of the Green Route. A small temporary (and backup) railhead just east of Eastlands Industrial Estate is only acceptable during the early construction phase and whilst the Green Route is being built although it is noted EDF wish to use the existing railhead for this phase. The existing railhead is not

suitable, even with an extension and should be discounted. It will be easy to establish one in the LEEIE and this should be firmed up. **For the Railhead and Eastlands options train movements should not be permitted between 2100 and 0700 hours due to the proximity of the line (and railheads) to residential areas.** This appears to be in the document but it was felt it needed reinforcement. The Green Route, once completed, would then avoid the double handling of freight and keep disruption to traffic in Leiston (two level crossings closed numerous times a day) down significantly. **There remains concern about the queuing time and impact on residents, Sizewell B staff, Sizewell A staff and visitors, caused by the level crossings. The site accesses to the LEEIE will also seriously disrupt the Crown Farm area and traffic flow. Traffic on Station Road, backed up in front of the Masterlord Industrial Estate when gates closed is also of concern during this phase. All these issues also affect the emergency services.**

- 7.3 If the Green Route is decided upon then mitigation would have to be made for the first two years for freight coming through Leiston until it was in use. It would be totally unacceptable to have manned crossings anywhere on the route to the LEEIE from Saxmundham so automatic barriers would have to be installed, before day one, at King George Avenue, Station Road and the other crossings affected. When the Green Route is constructed, again, there needs to be automatic barriers on Buckleswood Road and Abbey Road. **It is not acceptable to block Buckleswood Road or any other road or to divert other public rights of way for purposes of this construction.** (A bridge must be as costly as an automated crossing in Buckleswood Road?). The Green Route should be used to take traffic off Lovers Lane and must be the preferred route for all the construction companies to avoid loading and unloading twice. The Buckleswood Road closure would also have an unacceptable impact on local businesses.
- 7.4 There is serious legacy potential for a station to be built alongside the siding on LEEIE toward the end of construction for future passenger use. (This would require a small car park)
- 7.5 The traffic flows from the models indicate the biggest impact on Leiston will be on Waterloo Avenue (Saxmundham Road). This is a difficult road to navigate and has been subject to a TRO to get it as free flowing as it currently is whilst still maintaining essential on street parking. It is a very uneven and pockmarked surface and is very noisy for residents on that road. A smooth noise treated surface would be required to ease this loss of amenity. A similar treatment should be given to the road from Knodishall right down Haylings Road, Park Hill and Station Road as this route will also have heavy use.
- 7.6 ***A clear picture of what is expected to happen in King Georges Avenue is still missing!*** This was stated in our Stage 2 response. The detail and proposed mitigation for this important route is required as soon as possible and definitely before Stage 4/DCO. This is especially pertinent during the initial two years and Leiston Town Council need to discuss this further with EDF Energy as soon as possible to ensure baselines and predictions are understood. It is obvious that a large proportion of the traffic that EDF Energy predict will use Station Road will actually use King Georges Avenue and bleed from the other predictions will also occur.
- 7.7 The more specific detail now attached to the Land East of Eastland's Industrial Estate (LEEIE) gives rise for serious concern with the positioning of the topsoil stockpile and other issues regarding the caravan site and the site entrances. Option

2, for the rail siding to be situated North of King Georges Avenue, is the only sensible one and this would have LTC support until the green route materialises. With the historic and severe flooding problems experienced at the end of Valley Road by Archway Cottages however, it is felt that increasing the height of the land immediately to the South of this with the potential for increased run off from the soil stockpile would unacceptably exacerbate that situation. A complete and comprehensive surface water scheme must be presented at Stage 4. This would also include all the details on how sewage is dealt with on the site.

- 7.8 The eastern end of Valley Road that runs beside the LEEIE (locally named Kemps Hill) should be considered carefully for upgrade and investment as clear legacy mitigation. This road will be the main route into town for the 600 residents of the caravan site for which it is clearly unsuitable in its present form, especially after dark. The two options would be to pedestrianise it (In accordance with the Neighbourhood Plan) or to widen it and include a footway/cycleway and more passing places. Each option would need discrete lighting. The latter would allow large vehicles down to the sewage treatment plant from Lovers Lane and allow residents to safely use this road as a more forgiving carriageway. As a very poor alternative, a cycleway could be constructed behind the hedgerow on the Aldhurst Mitigation Site to allow residents to enjoy the current amenity they have to join up with the (new) bridleway and cycleway from Sandy Lane as another option to the footway/cycleway above. This could be used by the workforce and be a safer option than walking in the dark in the middle of the carriageway. This would be the absolute minimum mitigation for this option as, whatever is decreed, caravanners will take this route. A review of the type of lighting required on this stretch of road (or footway) should obviously be taken in relation to the adjacent wildlife area.
- 7.9 If the rail option comes forward the loop from Wickham Market to Melton is welcomed and is essential to ensure the East Suffolk Line (now finally on an hourly service) is not disrupted in any way by freight (like the Felixstowe line). **This would, otherwise, be unacceptable to all commuters and travellers who rely on this line.** In fact, for little extra cost, doubling the track between Saxmundham and Woodbridge (on the old track bed) would provide an important legacy and give EDF Energy more options. A thorough assessment of the impact of long, slow moving, diesel goods trains on the wider East Suffolk and Liverpool Street line is essential to ensure that no conflict evolves with the Felixstowe container traffic and that no passenger service is affected. This was not evident from the documentation. The studies into the impact of noise, vibration, air quality and disruption to adjacent properties is noted and welcomed. At this stage Leiston is protected from these impacts during the anti-social hours and this must be retained in your policy. The night time movement to the parking area near Saxmundham still affects properties elsewhere though.
- 7.10 **Abbey Lane** will continue to be an increasingly heavily used rat run. It is unsuitable for the level of traffic it currently receives **and ways of improving it or managing it must be investigated and implemented. There is no mention of traffic volume impacts on Abbey Lane in the presented documentation, either in the Transport Strategy where other lesser comments have been acknowledged or in the Traffic Modelling section where no relevant location for study is identified. Leiston Town Council, again, requests that this be addressed in any future documentation.** This could be the subject of focussed discussions/consultations with EDF Energy along with the town centre.

- 7.11 The Household Waste Site on Lovers Lane is a great community asset and an essential one for this whole area. **As a priority**, before the traffic flows increase along Lovers Lane the minimum improvements offered, in partnership with SCC, must be made to the site to make it safer to use for everyone's sake. This should however be escalated to include a perimeter road around the site to be put in on EDF land so vehicles enter the site some distance after leaving Lovers Lane – this would give plenty of space to queue off road when the bins are being serviced (HGV entrance still from Lovers Lane). If the current situation prevails, even with the proposed layby, there will be severe congestion and real road safety issues at this point (as is already the case). The County Council would need to relicense the site and they could possibly increase the capacity of the site at the same time.
- 7.12 Serious consideration should be given to imposing a permanent 40mph speed limit for the length of Lovers Lane due to the large volume of traffic, the proposed crossings, the site entrances and the other National Infrastructure Projects coinciding with the project on the C228.
- 7.13 The maximum by sea route sounded the best option in theory but is now discounted. The effect of the **Beach Landing Facility** though, assuming the sea option is not reinstated, must be studied by the EA and MMO to ease the worries of how this affects the coastal process. There is concern about the permanence of the Beach Landing Facility and its potential to become an unwanted groyne. A comprehensive and transparent scientific observation and analytical package should be put in place for the years to come to measure any possible effects. The landscaping and soil levels either side of the hardstanding from North Mound to the sea will need constant monitoring and maintenance to ensure they do not detract from the visual amenity or become an obstacle. **LTC propose and request that this is covered in a statement of common ground between LTC and EDF Energy.**
- 7.14 It is the Town Council's firm opinion that a roundabout should be installed at Crown Farm Corner at the top of King Georges Avenue. This would allow Sizewell A and B workers and residents (from the town) to get onto the C228 easier and more safely once that road becomes busier.**

### **Workers**

- 7.15 At Stage 2 EDF Energy estimated a "central case" workforce of around 5,600 workers. EDF Energy estimated that approximately 2000 of those will be home-based workers, and 3,600 will be non-home-based workers. On completion of the build there will be continued peaks and troughs with three reactors undergoing rolling outages. Stage 3 confirms this and gives more detail on the estimations based on experience at Hinkley plus a stress test for many more workers than expected to ensure current plans are adequate.
- 7.16 Leiston-cum-Sizewell Town Council is concerned about the potential 'informal' car parking that may take place in and around Leiston and Sizewell. There is a genuine fear that some workers may opt to drive closer to work instead of using the 'park and ride' system. There appears to be an intention to "register" workers and hold details of their car numbers which is supported and welcomed and may help eliminate the worse problems. There is also the prospect of houses in multiple occupation where the number of vehicles will exceed the on street parking capacity in the town. In this instance it is requested that EDF Energy consider whether the workers could leave their cars on site and use the bus service to and from work as appropriate.

## Buses

- 7.17 The idea of park-and-ride is a positive one, which should in theory remove some potential private vehicle traffic from the roads surrounding Leiston and Sizewell.
- 7.18 There will however be a lot of bus movements per day, which is likely to create a constant flow of buses to accommodate the varied shift patterns. EDF Energy believes that spreading the workforce shift patterns throughout the day will avoid network peaks albeit there will be a constant stream of buses on the B1122 amongst the HGVs if no link road is built.
- 7.19 It is a fact that buses frequently hold up traffic and cause congestion. This is likely to increase congestion on the surrounding road networks, which will have an impact on residents, businesses, and visitors to Leiston and Sizewell, and how they get about their daily business. Air quality monitoring along with noise and vibration monitoring at pinch points and residential areas along the B1122 must be installed if no link road is built.

## Heavy Goods Vehicles (HGVs)

- 7.20 Assuming a road led strategy, EDF Energy has estimated that at the peak of construction there could be up to 200 extra HGV/bus movements through Knodishall (and onward down Park Hill) and 1,450 extra a day along a Theberton by-pass/link road. The Light Goods Vehicles not operating under the postal consolidation facility protocols however (350) may well choose the A1094 which will impact Leiston enormously. The system described to us which will be applied to all vehicles over 3.5 tons sounds workable and is strongly supported. HGV's moving outside the contractual requirements to exit and access the site must be dealt with. It is essential that the return trips (empty) should also be regulated.
- 7.21 As with the issue of buses, HGVs will cause congestion to the surrounding road networks which will have a knock-on effect to the residents and businesses of Leiston and Sizewell. Air quality monitoring along with noise and vibration monitoring at pinch points and residential areas along the B1122 and in Yoxford must be installed.
- 7.22 All the junction improvements including Friday Street and Yoxford are fully supported, insisted upon and must be completed before the commencement of the project. Traffic delays due to the construction would be longer and more frustrating for our commuters should they overrun into the beginning of the construction phase due to the increased traffic this would bring just exacerbating the problem. The link road is absolutely essential to a road led strategy and, again, must be completed before commencement of the project. It is the Council's view **that this link road is also needed for the rail option as the level of HGV traffic on the B1122 will continue to be overly excessive.**

## Noise, Vibration, Dust and Air Quality

- 7.23 Potential environmental impact is considerable and widespread everywhere you look. Coastal process, noise, air pollution/quality, flood risk, groundwater extraction, traffic and of course, disruption and loss of amenity for all the local residents (to name a few).

7.24 The issue of noise, air quality (including dust) and vibration in relation to local communities is of significant importance. It is unclear how operations at the LEEIE will affect local residents but it is assumed that the noise and light pollution, in particular, will be significant and would affect residents up to 1km away. The EIA will be very comprehensive, large and difficult to understand in all likelihood and the fear is that the Non-technical summary will be too simple. **EDF Energy are requested to produce something in the middle which details how they will be mitigating and monitoring all the expected threats to the environment.** This should include air quality monitors at junctions and rail crossings which send an alarm at certain levels, (for instance), automatically triggering pre-determined actions designed to ameliorate the threat. A base line must be established at all the expected trouble spots before construction begins and the limits agreed.

### **Overall Traffic Assessment**

7.25 It is considered that the steady stream of additional traffic throughout the days, weeks, months, and years during the construction of Sizewell C and beyond is going to have a noticeable and significant impact on Leiston and Sizewell and on residents who commute from the town.

7.26 Leiston-cum-Sizewell Town Council would prefer that no Sizewell C traffic passes through Knodishall or Leiston and are very concerned at the impact on the town centre during the first phase when access to the site will be through Sizewell B and Sizewell A. They understand the freedom local workers will have to choose their routing though so it is very disappointing that our request at stage 2 for **EDF to fund a study on all aspects of traffic movement around and through Leiston has not been done. There is a serious need for control measures, signage and enforcement to ensure the correct routes are used and that the town centre does not suffer unduly.** *Leiston-cum-Sizewell Town Council also requested that they be involved in these discussions from the outset as local knowledge (and current issues) are well known. No approach has been made at all and, again, this is very disappointing.* Dialogue would have at least assured the Town Council that every available mitigation had been considered and assessed for feasibility. It is understood that the EDF Transport Team will be looking at this issue after Stage 3 and LTC would like to be involved in this please. Protocols and inducements should also be worked out to encourage avoidance of the town centre.

7.27 **In summary, the additional HGVs and buses on the B1122 if no link road built (rail option), the potential for 'informal car parking' in the town, the control of traffic through Leiston overall and the town centre in particular along with the noise and light pollution from LEEIE are of particular concern to Leiston-cum-Sizewell Town Council.**

## **8.0 EDF ENERGY OPTIONS**

8.1 Leiston-cum-Sizewell Town Council has the following comments to make on the choice of options since the Stage 2 consultation.

### **Accommodation**

8.2 Leiston-cum-Sizewell Town Council still welcomes the option to incorporate a practical and well-run accommodation complex within walking distance of the construction site. This will reduce car travel and bus journeys. The intention to place

the sports site in Leiston is also very welcome. The new road, cycleway and bridleway arrangements look manageable and safe and provide good connectivity for Leiston residents who take recreation across the Sandlings beyond Eastbridge. Other suggestions for enhancements to this PROW scheme are made above, in particular, a crossing south of Kenton Hills entrance and a permissive path under the adjusted causeway.

- 8.3 Sports provision. The proposed off site pitches and MUGA at Alde Valley Academy and Leisure Centre must be floodlit to ensure they are useable all year round. It is requested that a further 3G pitch also be laid at the Leiston Town Athletics Association (LTAA) in Victory Road (home of Leiston FC) at the same time as a community legacy for the Leiston Town youth teams – this would be extremely beneficial and much appreciated. It would allow the numerous youth teams to all take advantage of an improved training facility – the current field has to be restricted in periods of bad weather whereas a 3G pitch would allow access all year round.
- 8.4 As Sizewell A is Government owned under the Nuclear Decommissioning Authority, EDF Energy is encouraged to engage with the regulatory authorities to investigate using as much of the A site as possible for relocation of Sizewell B facilities rather than desecrating Coronation Wood and the Pill Box field. These relocation decisions and plans should not be approved **or, as a minimum, have a planning condition, that they not be allowed until the DCO obtains consent** if they do not use Sizewell A land.
- 8.5 It is the firm recommendation of Leiston Town Council that the Visitors Centre not be relocated to Coronation Wood but that it be sited in the town centre as a tourist attraction much more accessible and visible than on the licensed site. This would allow much better access as security would not be an issue and any tours could set off from here, again, with security already concluded. It would also reduce the number of vehicles going to the site as visitors could be transported by minibus.
- 8.6 There will be impacts on Leiston's infrastructure as a result of the proposed accommodation campus, which needs to be carefully considered. The off-duty workforce will have access to private vehicles and will undoubtedly visit Leiston for a variety of different reasons. Currently, Leiston will have difficulty in physically absorbing the demands of Sizewell's off-duty workforce, particularly parking. Therefore, the impacts on Leiston must be fully assessed and understood, **a shuttle bus running on a sensible agreed schedule would be useful in alleviating the parking issue. Enhancements to the current parking facilities, working in partnership, would also be welcome to mitigate this. (See Annex B)**

### **Park and Ride**

- 8.7 Leiston-cum-Sizewell Town Council supports both sites chosen for Park and Ride albeit the Wickham market one has some issues with traffic from the west. This would be the case if the Park and Ride were further north along the A12 in any case. There is legacy potential for the Darsham site to continue to be used by local people as a free car park for commuting after construction and this is welcomed. Perhaps some slots could be allocated for this purpose from day one. At Wickham Market the slip road onto the A12 just before the reduction to single carriageway will make for hazardous situations occurring and a solution to this should be sought.

- 8.8 The Leiston-cum-Sizewell Town Council are adamant there should be no additional traffic through Leiston if at all possible. Ways of trying to reduce the predicted journeys through the town must be investigated and the Town Council would wish to meet EDF Energy before the DCO to examine local traffic management more forensically– this would cover the other aspects of Lovers Lane, Abbey Lane and the C228.
- 8.9 A ‘vehicle number plate recognition’ system must be part of any solution (and we believe this has been promised) and would be a way to monitor additional traffic in the town over the predicted levels EDF Energy currently suggests. This would then enable corrective policies to be put in place to counter the problem through the Community Construction Consultative Committee (name to be confirmed).

### **Transport Improvements**

- 8.10 Leiston-cum-Sizewell Town Council has been considering the options for highway improvements that are currently being put forward by EDF Energy at this Stage 3 consultation.
- 8.11 It is noted that any potential transport improvements must properly consider the emergency services, so that any potential impacts are understood. The Town Council would therefore support any responses made by these organisations.
- 8.12 The B1122 is a vital transport route into the Sizewell site, and it is considered that it will need some considerable improvements to be able to continue to serve the nuclear power station well into the future. The Leiston-cum-Sizewell Town Council therefore fully supports the roundabout at Yoxford and the Theberton by-pass proposals as a minimum and a legacy. **The link road option is a minimum for the road led strategy and should also be included in the rail led strategy as there will still be unacceptable levels of HGV, bus and car movements along the B1122 during construction under this option.**
- 8.13 Country lanes and Public Rights of Way that are affected by any improvements, be it the link road or the Theberton bypass, must be kept open and accessible. The documentation gives concern that some of these might be closed off. The existing network must remain useable.
- 8.13 The link road, should it prove successful, would be a further legacy if it was retained after construction but there are concerns about it ultimately then becoming a catalyst for housing growth in the countryside once the site has settled into the operation phase.
- 8.14 At Farnham the two-village bypass is welcomed as it creates a safer junction with Friday Street. This part of the consultation should depend entirely on the views of the residents affected though and the Farnham resident’s views must be given primacy in the final decision. However, with the potential impact of additional movements through the villages of Marlesford and Little Glenham, a four village option is a minimum for a road led strategy to mitigate the environmental impact at these locations and the increase in noise during unsociable hours. Every avenue must be explored to get this option funded as soon as possible. Other incipient NIPs should contribute accordingly.
- 8.15 The small adjustments and improvements to the various junctions are all welcomed.

8.16 A similar exercise must now be done on the local roads around Leiston to ensure an overarching signage scheme is prepared to guide traffic clearly to their proposed destinations. This has to include relevant “do not follow Sat Nav” signs! The Town Council, again, would like to be involved in this.

8.17 The Town Council are unhappy with the current siting of the helipad and feel that there must be a more suitable site which does not disturb the Broom Covert wildlife area more than necessary.

## **9.0 CONSTRUCTION PHASES**

9.1 Leiston Town Council is very concerned about the proposed operations during Phase 1 of the construction. The increased useage of the C228 will cause disruption and congestion along the only access to SZB and SZA and will make cycling and walking uncomfortable or even undesirable. The entrance to the proposed site from the B1122 should therefore be a priority, followed by the Access Road and the SSSI crossing. The commencement of works to the foreshore should not be undertaken until these are in place and other operations where spoil has to be removed should also wait until this access is complete. The adverse and severe effects of using the entrance to Sizewell B for anything other than works to help accommodate this must be avoided. Every effort should also be made for the wider transport infrastructure links and signage to be in place before Phase 1 commences. It is appreciated that the timeframes for this may well mean they overlap but this will hinder EDF work and the local population to an irritating and unfortunate degree. Please continue to note the demand for there to be no access to the frontage of the site from Sizewell Village.

## **10.0 EVIDENCE**

10.1 These representations have largely concentrated on localised amenity impacts and traffic impacts that will be associated with the proposed development of Sizewell C.

10.2 It is unclear and difficult to understand just how much impact the soil removal and borrow pits will make on the visual impact of the site. It is expected that the County Council will comment more fully on this as well as the Environment Agency as, with minimal understanding of the environmental consequences, Leiston Town Council would support any concerns raised by these agencies.

10.3 The Environmental Agency must be very clear that the proposals will not in any way affect the natural flow of the Leiston River or the operation of the Minsmere Sluice (including interfering with the coastal process via the emerging BLF proposals). There should also be an undertaking from EDF Energy to pledge resources into ensuring that the outflow from the Leiston Water Treatment Plant will always be maintained to its current level so that no back up or flood problems occur in the future as well as becoming responsible for the sluice and outlet there as any coastal process which affects these will undoubtedly be due to the works at SZC.

10.4 The overall land-take of the laydown site has reduced marginally from stage 2. With the experience of Sizewell B, Leiston-cum-Sizewell Town Council would suggest that some temporary uses will last longer than the 10 years envisaged, some closer to 20 years. Further information on the temporary uses is therefore also requested with a clear timetable for decommissioning. It is also difficult to envisage where the new line is to the east of the site without accurate mapping. It does look as though the whole project is beginning to encroach unacceptably beyond this onto the beach. In line with the frontage of Sizewell B must be the minimum encroachment. The

height of the defences has also pushed them eastward at the bottom. These will be fenced for many years to come to allow regrowth so a footpath close to the top of the defences could be incorporated into the design to allow for sea level rise and weather scouring across “the recreational corridor” to the bottom of them.

- 10.5 Leiston Town Council understand EDF Energy are in discussions with Essex and Suffolk Water and that there are no problems in them delivering enough potable water. The EA and The Local Flood Authority will be responding and liaising with EDF Energy on the use of water and run off etc. and Leiston Town Council would support their recommendations on these aspects. Issues of drainage and run-off highlighted by the Minsmere Levels Stakeholder Group (of which the Town Council is a prominent member) must also be addressed.

## 11.0 CONSULTATION PROCESS

- 11.1 This further stage of consultation was necessary and welcome. It added a lot of detail and firmed up some of the options to allow more critical assessment. **Before moving onto Stage 4 however the Town Council would welcome additional talks with EDF Energy to discuss the responses from this stage and to also be included in any discussions as they set out their preferred direction of travel to address them.** Any workshops or discussions with East Suffolk District Council (ESDC) and SCC should, as a courtesy at this stage, now include an invitation for Leiston to have a representative present. This request was ignored at Stage 2 and it is dispiriting and frustrating that no attempt was made to engage with members on virtually any of the issues requested in the last two years.

## 12.0 CONCLUSIONS

- 12.1 Leiston-cum-Sizewell Town Council cannot support the proposals for a further nuclear power station at Sizewell until the impact on amenities, environment and traffic are resolved satisfactorily in relation to Leiston and Sizewell. It is looking increasingly probable however that the use of this **limited site is too ambitious and would ultimately be wholly detrimental to the surrounding area.** Is the negative impact greater than the benefits the project brings? There is low unemployment in the immediate area so short term jobs at the construction site will be at the expense of long term sustainable jobs in the tourist industry which will be severely affected. There will be new unsightly pylons in the AONB. The affects on the Coastal path are unquantifiable at this stage but will be severe. The socio-economic uplift to the area and businesses will be substantial and welcome. Training and skills could be of benefit if liaisons are established in the town and, trying to look past construction, EDF Energy’s proven stewardship of the countryside has been beneficial to the area after Sizewell B.
- 12.2 Impacts on the beach, public rights of way, and areas of local, regional and international importance from a heritage and environmental perspective, must all continue to be fully and appropriately considered. **The current suggestions are the minimum and must continue to be part of the proposals.**
- 12.3 Issues associated with previous developments at Sizewell, including the loss and restrictions on public rights of way, and anti-social issues associated with such large scale development, must all be correctly addressed.
- 12.4 There is a worrying lack of detail, particularly in areas that affect the centre of Leiston, especially the traffic bleed from the major routes. The traffic and increased

population in Leiston Town Centre, especially during the early construction, will significantly affect residents and the community. A comprehensive package to investigate, manage and alleviate this must be agreed with Leiston Town Council.

- 12.5 It should be noted that there will be spent nuclear fuel stored on this site for the lifetime of the station (and probably beyond). This is a long term blight on the Parish of Leiston-cum-Sizewell.
- 12.6 The maximum transport infrastructure options need to be provided to alleviate the east Suffolk road network as much as possible. The lead in and first two years of the construction phase will leave infrastructure that will have to serve a growing population in this area for years to come. **Getting it right first time and to a high standard** will be of clear benefit to everyone.
- 12.7 Overall, it is considered that, with the appropriate mitigation set out here, the options supported in this response are the best for Leiston-cum-Sizewell and should continue to be refined and negotiated with this Council to allow a fruitful and beneficial partnership to go forward for the years ahead if Sizewell C gains Secretary of State approval.

## APPENDIX A

### **Leiston-cum-Sizewell Town Council – Immediate and Long-Term Community Requirements.**

It is believed that this project is of such a scale and is of such national significance that the normal criteria for Section 106 considerations is not sufficient to compensate the Parish of Leiston-cum-Sizewell for hosting and accommodating the vast majority of the disruption and inconvenience that will accompany the build. The long-term legacy of an access road across the AONB, a large prominent industrial complex on the heritage coast, also in the AONB, plus the plans to store spent fuel in the Parish for an indefinite period are also factors that need mitigation through various immediate compensatory measures and a long-term community fund.

The Town Council appreciate that the legal framework for such matters will be through the Principal Councils **but would request that strong support be shown by EDF Energy for Leiston-cum-Sizewell's aspiration for a certain percentage of any long-term community fund to be protected and earmarked for post code IP16** in which the whole of the works will sit. The Town Council is willing to administer any local fund should that be considered a better alternative and is comfortable with, and constituted for, a legal agreement to do so.

Appendix B covers the town centre and the issues of traffic and community facilities required for the construction. This sets out an approach that EDF Energy may find more appropriate, localised and holistic to help them deal with many of the Town Centre issues being identified.

The other, more specific, items on the wider scheme that require mitigation measures which would help alleviate the impact of Sizewell C and meet resident's needs are summarised below.

| Required Mitigation Measure/Community Benefit   | Why it is required?   |
|---|---|
| Include a crossing for cyclists/walkers on Lovers Lane 50m south of entrance to Kenton Hills.   | The proposed cycleways around the Aldehurst Farm Habitat site need a link to the Kenton Hills Walk away from the Laboratory corner which would be unsafe.   |
| Enhance existing cycle path along C228.<br><br>See paragraph 9.1  | The new cycle path proposals (for Stage 3) are welcome and essential along the B1122 and Lovers Lane. The current cycle path to Sizewell needs refurbishment and strengthening as it will be an essential facility during the first two years when the C228 takes all the construction traffic.   |
| Improvements to Valley Road (East) aka Kemps Hill.<br><br>See paragraph 7.8   | When the caravan Park and laydown/temporary railhead north of Crown Lodge are constructed this section of Valley Road needs to be either two way or have a dedicated cycleway/footway put in alongside the existing narrow track for pedestrian safety. This would be a very useful legacy project that would benefit the town enormously and allow EDF workers to walk safely to town. If, widened and upgraded it would allow HGV tankers access from Lovers Lane to the sewage treatment plant (as a further legacy).  |
| Highway low noise resurfacing from Highbury Cottages to White Horse Corner and through Knodishall all the way to Kings Road in Leiston.<br><br>See paragraph 7.5  | Mitigation for the huge increase in private and white van traffic expected through these two entry routes, especially during the first two years. The noise from the poor surfacing at the moment is annoying and further increase in traffic would make it very uncomfortable, especially at night.  |
| Strengthen the beach track that the Nuclear Constabulary use from Sizewell Gap to Sizewell C site.<br><br>Current issue.  | This will protect the dunes etc. from further erosion and is work that currently needs done. The police will be more vigilant during construction one presumes and use it more so a small investment now would be very useful. (Notwithstanding a written agreement that this will not be used for Sizewell C work of any sort.)  |
| Engage with the Leiston Works Railway. Consider a future station.<br><br>Ongoing community engagement<br><br>Provide a 3G pitch at the LTAA in Victory Road to enhance and secure training facilities for the | Engagement with the industrial heritage of the parish by becoming involved with the Leiston Works Railway Project and looking at ways to possibly leave an impressive legacy from the rail works proposed for the construction. A Passenger service could be re-instated after construction with a station on LEEIE – useful for outages with residual Park and Ride facilities left at Wickham perhaps. This would be an ongoing item and something to investigate.<br><br>The proposed off-site sports facilities at Alde Valley Academy would, most probably, have to be reserved for SZC staff and workers for the majority of the day. The |

| <b>Required Mitigation Measure/Community Benefit</b>  | <b>Why it is required?</b>   |
|---|--|
| <p>numerous youth football teams that are parented by the Leiston Football Club at this location.</p> <p>Para 8.3</p>                                     | <p>provision of another facility at the LTAA would allow young people to enjoy similar facilities at all times and be able to train and play throughout the year.</p>  |
| <p>Support for a small ambulance station at the Fire/Police station in King Georges Avenue.</p> <p>Para 5.3</p>   | <p>To protect response times to IP16 once construction and construction traffic increases congestion on routes to Leiston.</p>   |
| <p>Establish/support a training and skills centre in Leiston</p> <p>Para 5.5</p>  | <p>In partnership with Suffolk New College (on the Coast). An important legacy but much needed for vocational training during the build to increase local skill base.</p>  |
| <p>EDF Fund a comprehensive and traffic survey around Leiston</p>   | <p>There is no baseline which the inevitable and unquantifiable (at this time) increase in traffic through the narrow and restricted town centre of Leiston can be judged. A study needs to be done to ensure this can be accommodated and ameliorated properly.</p>                       |
| <p>Install evidential quality CCTV (unmonitored) in town centre, on King George Avenue and on Valley Road.</p> <p>Community and worker safety.</p>        | <p>This is for the safety of residents and workers alike.</p>  |
| <p>Replacement of the Dinsdale Road Toilets with a modern facility that could remain open 24/7 (currently closed at 6pm).</p> <p>See paragraph 6.4</p>    | <p>Small but important item retained from Stage 2. To help meet the needs of an increased resident, worker and visitor population. This is the tourist and transport hub of the town and centre of the night time economy. It would be essential for EDF workers as well as residents.</p> |
| <p>A permissive path be provided from Kenton Hills to the beach under the access road/three span bridge as soon as possible.</p> <p>See paragraph 6.2</p> | <p>The access to the Minsmere levels along the beach will be ugly and difficult. The current access to the beach from Goose Hills is a major asset and allows the RAMSAR, SSSI and AONB to be fully enjoyed.</p>   |
| <p>Household Waste Site on Lovers Lane realigned and enlarged</p> <p>See paragraph 7.11</p>   | <p>Road Safety. A road around the current site to allow traffic to queue off road is essential. A layby is not enough and would not work well.</p>   |
| <p>Substantial walkway to be laid across the shingle during initial beach works and for duration of construction.</p> <p>See paragraph 4.7</p>            | <p>To allow less steady residents to negotiate the Coast Path.</p>   |
| <p>A shuttle bus into town from the campus and the implementation</p>   | <p>To alleviate anti-social behaviour and to allow workers to enjoy the night time economy responsibly.</p>  |

| Required Mitigation Measure/Community Benefit  | Why it is required?  |
|--|--|
| of a strict drug, alcohol and acceptable behaviour policy. See paragraph 5.7   |  |
| Double railway track from Saxmundham to Woodbridge<br>Para 7.9   | A better alternative to the proposed passing loop and a major legacy.  |
| Leiston Town Council and other relevant bodies form a "Construction Consultative Committee" with EDF Energy at the outset of this project to meet regularly and have executive powers to help the project run smoothly as issues are identified.<br><br>Para 5.7 | It was an essential body during the SZB build and should be repeated for SZC. The Town Council played a major role in forming its remit and determining its Agenda to quickly address any issues affecting the local residents and visitors etc. |

## APPENDIX B

### LEISTON TOWN CENTRE IMPACTS AND PREFERRED MITIGATION WITH REGARD TO SIZEWELL C PROPOSALS

#### Introduction

1. There are several elements to the proposals presented at stage 3 of the EDF Energy consultation for Sizewell C that give cause for concern. Appendix A summarises the majority of mitigation measures sought for the wider parish area but it was felt necessary to try and establish a more robust and far reaching solution to the problems that will be faced in the town centre itself. The initial paragraphs below are carried forward, repeated or summarised from the main response to enable this Annex to be viewed separately.
2. The most immediate is traffic and how cars and vans will access the construction site and the Land East of Eastland's Industrial Estate (LEEIE) in the early years of construction.
3. Concurrent with this is the expected popularity Leiston will have amongst the workforce for shopping, recreation and entertainment.
4. Both of these issues will have a major impact on residents and visitors when measured against the current (2019) baseline.
5. These immediate impacts will be felt over and above the other town centre issues noted in our main response of
  - Housing – young residents seeking private rental accommodation. This is currently reasonably priced but could become difficult to find and more expensive as workers find a base near the site.
  - On street parking pressure from Houses in Multiple Occupation
  - Town Centre parking – for workers, residents and visitors alike will become problematic
  - Labour market – will be distorted
  - Commuting – roadworks and increased traffic will make this more difficult for residents working outside Leiston
  - Night time economy – albeit this could be extended by shift patterns to daytime too. It is anticipated that this will be much better than when Sizewell B was built but the increase in numbers and the ease of perpetrating anti-social behaviour will make the town centre less desirable for many residents and potential visitors.
6. The number of workers, the perceived potential for antisocial behaviour and the squeeze on parking will possibly affect the evening custom at the Film Theatre although this could be offset by the number of workers who might take advantage of this facility.
7. Overall, Leiston-cum-Sizewell Town Council is very concerned about the change of tempo, rurality and amenity that its 6,000 residents currently enjoy in this genteel market town.

## Evidence

8. There are currently no studies that predict the number of extra journeys that would transit to Sizewell C through the town centre. There are no baselines in the presented documentation either. The traffic increase experienced during an outage gives an indication of the gridlock that can be expected to occur and the first thing that needs to be done is to gather evidence of the current situation.
9. It is clear, even over and above anecdotal submissions, that many workers, coming from outside Leiston before the Park and Rides are established will be tempted to avoid the trek down Abbey Road to Lovers Lane and will choose to go straight through town. The bleed from the predicted journeys in the presented documentation (for Waterloo Avenue and through Knodishall) will be substantial too.
10. The town centre suffers from narrow pavements and an inconvenient set up at the town centre crossroads which increases waiting time at the traffic lights. The pavements around this area are only just capable of being navigated by a push chair and wheelchair users are particularly disadvantaged by the lack of width, exacerbated by the street furniture needed for the pedestrian crossings.
11. An increase in traffic through the centre will increase air and noise pollution and inconvenience residents and tourists alike.
12. The High Street Car Park is an essential facility for the Film Theatre and, being free after 6pm, is invariably full each evening. The introduction of a 2 hour enforceable car parking limit in the Co-op car park has not helped albeit one can now, generally, find space there when the store is open to shop. There are no other convenient car parks in the centre and the on street parking is at capacity.
13. The Library has three computer terminals for residents and visitors to use (and print from) and these are all, generally, fully booked each day as job hunting and universal credit (and other services) require internet access and submission these days. It is hoped to be able to increase this for residents and visitors by moving premises and increasing space and availability.
14. Ambulance response times have been castigated by our MP and Leiston Town Council have, over many years, lobbied and engaged with the ambulance to try and improve them for IP16. It is the rural situation of the town and the distance from the A&E that, combined, would require substantial investment in people and equipment to give the necessary ability to confidently respond in time. The congestion on access roads from Ipswich caused by Sizewell C will exacerbate this.
15. The tourism offer that Leiston has, and is currently seeking to extend, revolves mainly around the historical setting and the industrial heritage that has shaped its expansion. Leiston Abbey will be less accessible with the congestion that area will see during construction and it will be a challenge to attract visitors to the centre to experience the tranquillity of the Old Post Office Square on Main Street and the Long Shop Museum.

## Proposals for mitigation and partnership working

16. In our stage 2 response Leiston Town Council lobbied for support for the proposed regeneration of Leiston Town Centre as was then being drawn up in a Neighbourhood Plan. This is now complete and has been adopted.
17. Since stage 2 great strides have been made and a very fruitful partnership has been formed which operates under the banner of Leiston Together. This is a collaboration of the County, District and Town Council along with the Leiston Community Land Trust, Leiston Business Association, the Alde Valley Academy and Community Action Suffolk. It looks at various initiatives but its main aim is the careful and appropriate regeneration of the vast redundant land in the Town Centre behind Sizewell Road.
18. The main lead in this venture is the Leiston Community Land Trust. Since stage 2 they have become a constituted body with 130 members from the community, 7 of which are on the board. Leiston Town Council has a representative on the board but encourages the independent and entrepreneurial work the CLT are doing. Currently they are in discussions with housing associations to establish a partner for housing aspect of the project.
19. The District Council has purchased a large section of land needed for the project and the CLT, working with Suffolk Libraries and Leiston Town Council are working with them to help develop the civic element of the project. This would be to open an area for a small market and town square, build civic offices and a library around this (as well as other commercial aspects)
20. The elements that would help mitigate Sizewell C impacts are
  - Increase size and provision of the library for residents and workers benefit through relocation as part of the town centre project
  - Possible relocation of the job centre from an industrial estate on the outskirts back into the town centre next to the Library for ease of use (much more use expected once construction starts)
  - Relocation of the Town Council offices incorporated into a modern, community friendly hub
  - Possible relocation of Citizens Advice to be more central position and integrated with the hub
  - 24 hour toilet provision and a much needed increase in parking provision
  - Traffic management commensurate with the predicted use
21. The regeneration needs to consider various options for town centre realignment and traffic control which would allow the centre to be more pedestrian friendly, discourage through journeys, attract visitors for dwell time and increase parking. All these options could form part of the structural, economic and environmental regeneration plan currently taking shape.
22. To achieve a coherent, vibrant and attractive town centre, partnership working and substantial funding will be required.

23. The District Council have the land, the CLT are working on the housing aspects of the scheme with Leiston Together and are also looking at how to seed the civic project in conjunction with this.
24. It is considered by Leiston Town Council that a financial commitment from EDF Energy toward this project and any highway improvements would be considered a major socio-economic mitigation for the cumulative effects in Leiston that will be felt over the coming years. They would also like to see EDF Energy seek to become a partner in Leiston Together on this basis to take part in the regeneration and be a stakeholder in Leiston for the years to come.

### Conclusion

25. Separate from the specific and material mitigation requests at Annex A it is strongly recommended that EDF Energy invest a proportion of their proposed Community Fund in the Leiston CLT. EDF Energy representation on the board would be most welcome to reinforce the relationship between Leiston and it's closest significant and long term neighbour and would give it an oversight of its investment. This would help support the town centre's ongoing management and regeneration and provide a major contribution to the mitigation and compensation needed to alleviate the effects of this long term project on the town.